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Sam A. Schmidt, Esq.

September 24, 2018

Honorable Sidney H. Stein, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *U.S. v. Andrew Owimrin and Shahram Ketachbi*
17 Cr. 243 (SHS)

Dear Judge Stein:

In response to the requested voir dire questions proposed by the government defendant Andrew Owimrim respectfully requests that your Honor supplement the traditional *voir dire* with the following questions:

1. You will hear evidence involving telemarketing and business services firms. Many people are annoyed by telemarketers and have negative feelings about them.
 - a. Do you harbor such feeling?
 - b. If so, would such feelings effect your ability to impartially hear and decide the issues in this case?
2. This case also involves firms that sold products and services for small, "work from home" businesses.
 - a. Have you or a close family member or friend ever started a work from home business?
 - b. Have you or a close family member or friend lost money from

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investments due to fraud or mismanagement by someone providing you with business services or advice?

- c. Have you or any close family member or friend been a victim of any type of fraud?
3. Do you or any close family member or close friend believe that they were taken advantage of by a telemarketer or business advisor?
4. Has any telemarketer or other business advisor tried to take advantage of you or any close family member or friend?
5. Have you or any close family member or friend ever lost money in investments or a business that it changed your or their lifestyle?

Respectfully submitted,

/s/

Sam A. Schmidt

Abraham Hassen

Attorneys for Andrew Owimrin